

1 THE HONORABLE JAMES L. ROBART
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 CARMEN JOHN PERRI,

10 Plaintiff,

11 v.

12 MAYFLOWER PARK HOTEL, INC.,

13 Defendant.

No. 2:19-cv-00132-JLR

STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANT TO RESPOND TO
COMPLAINT IN RE: PERRI v. 621
APARTMENTS, LLC

(RELATING TO No: 2:19-cv-00139-JLR)

NOTE ON MOTION CALENDAR:
MAY 16, 2019

16 CARMEN JOHN PERRI,

17 Plaintiff,

18 v.

19 425 QUEEN ANNE, LLC,

20 Defendant.

No. 2:19-cv-00137-JLR

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STIPULATION AND [PROPOSED] ODER TO EXTEND
DEADLINE FOR DEFENDANT TO RESPOND TO COMPLAINT
– Page 1

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1	CARMEN JOHN PERRI,	No: 2:19-cv-00139-JLR
2	Plaintiff,	
3	v.	
4	621 APARTMENTS, LLC,	
5	Defendant.	
6	CARMEN JOHN PERRI,	No: 2:19-cv-00144-JLR
7	Plaintiff,	
8	v.	
9	SORRENTO HOTEL PARTNERSHIP,	
10	Defendant.	
11	CARMEN JOHN PERRI,	No: 2:19-cv-00297-JLR
12	Plaintiff,	
13	v.	
14	2301 THIRD AVENUE, LP,	
15	Defendant.	

16 Plaintiff Carmen John Perri ("Plaintiff") and defendant 621 Apartments, LLC
17 ("Defendant"), by and through their undersigned counsel, hereby stipulate to an extension of
18 the time for Defendant to answer or otherwise respond to the Complaint [Dkt. No. 1, Case No.
19 C19-0139JLR] to June 21, 2019, to further facilitate the prospect of settlement discussions.
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21 The Parties hereby submit that good cause exists for extension of the time for Defendant
22 to answer or otherwise respond to the Complaint, as follows.
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- 25 1. Plaintiff filed the Complaint on January 30, 2019.
2. Defendant received the Summons and Complaint in early February, 2019.

STIPULATION AND [PROPOSED] ORDER TO EXTEND
DEADLINE FOR DEFENDANT TO RESPOND TO COMPLAINT
– Page 2

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3. Defendant's counsel was first retained in this matter on April 18, 2019, and filed a Notice of Appearance on April 19, 2019.

4. Plaintiff has made a settlement demand, and, to allow Defendant through newly-retained counsel the opportunity to consider the settlement demand, the parties agreed to an extension of the deadline for Defendant to respond to the Complaint to May 21, 2019 and filed a stipulation to that effect on May 9, 2019.

5. Currently, the parties are actively engaged in settlement discussions and request that the deadline for Defendant to respond to the Complaint by extended to June 21, 2019, to facilitate such discussions by allowing more time before Defendant undertakes the expense of preparing a response to the Complaint.

DATED this 17th day of May, 2019.

s/ Todd T. Williams

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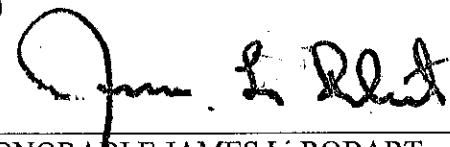
s/ Dan N. Fiorito

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Attorney for Plaintiff

1
2 **ORDER**
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4 Pursuant to the parties' stipulation, IT IS SO ORDERED.
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6 DATED this 17th day of May, 2019.
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9 HONORABLE JAMES L. ROBART
10 United States District Judge

11 Presented by:
12

13 CORR CRONIN LLP
14

15 *s/ Todd T. Williams*
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22 *Attorneys for Defendant*

23 COZEN O'CONNOR
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25 *s/ Dan N. Fiorito*
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35 STIPULATION AND [PROPOSED] ODER TO EXTEND
36 DEADLINE FOR DEFENDANT TO RESPOND TO COMPLAINT
37 – Page 4

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